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Marlene H. Dortch – Secretary
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

**Re: Applications for Approval of Transfer of Control Filed by Verizon
Communications Inc. and MCI, Inc., WC Docket No. 05-75**

Dear Ms. Dortch:

This letter provides the information specified in paragraph 227 of the Commission's Order approving Verizon's acquisition of MCI, Inc.,¹ which requires Verizon to "notify the International Bureau whether any of its subsidiaries or foreign affiliates owns or controls a five-percent-or-greater interest in any submarine cable licensed by the Commission and uses any of the U.S. points of the cable system."² As described below, Verizon has two foreign affiliates that meet these criteria:

1. CANTV

Compañía Anónima Nacional Teléfonos de Venezuela ("CANTV"), a Verizon affiliate in Venezuela, has a 16.14% voting interest in the Americas-I cable system.³ CANTV is also "using the U.S. points of the cable system" as that phrase is defined by the Commission's *Submarine Cable Report and Order*⁴ as a result of its ownership interests in segments of the cable that use U.S. points.

¹ *Verizon Communications Inc. and MCI, Inc., Applications for Approval of Transfer of Control*, Memorandum and Order, WC Docket No. 05-75, FCC 05-184 (rel. Nov. 17, 2005) ("Verizon-MCI Order").

² See 47 C.F.R. § 1.767.

³ See *Verizon Communications Inc. and MCI, Inc., Applications for Approval of Transfer of Control*, Public Interest Statement, Attachment 10, Declaration of John J. Lack and Robert F. Pilgrim, at Exhibit 1, WC Docket No. 05-75 (filed Mar. 11, 2005).

⁴ See *Review of Commission Consideration of Applications under the Cable Landing License Act*, 16 FCC Rcd 22167, ¶ 54 n.119 (2001) ("Submarine Cable Report and Order") (defining "using the U.S. points of the cable system" to include "use of U.S.-end half-circuits for transport or for sale of capacity").

CANTV also has a 5.96% voting interest in the cable system Americas-II. CANTV is also "using the U.S. points of the cable system" as a result of its ownership interests in segments of the cable that use U.S. points.

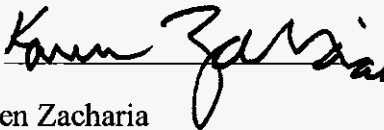
2. Verizon Dominicana

Verizon Dominicana, C. por A. ("Verizon Dominicana"), a Verizon affiliate in the Dominican Republic, has a 39.76% voting interest in the Antillas-I cable system. Verizon Dominicana is also "using the U.S. points of the cable system" as a result of its ownership interests in segments of the cable that use U.S. points.

In the *Verizon-MCI Order*, the Commission also noted that Verizon and its subsidiaries and affiliates appeared to own a 5 percent or greater capacity interest in the Japan-US ("JUS") and Columbus-II cables.⁵ The Commission is correct that Verizon Hawaii International Inc. ("VHI") holds a five percent interest on the JUS cable. VHI, however, is already a licensee of the cable⁶ and no other Verizon entity holds a 5 percent or greater voting interest in the cable. No single Verizon subsidiary or affiliate holds a five percent or greater interest (voting or otherwise) in the Columbus-II cable.

Please do not hesitate to contact the undersigned if you have any questions or need further information.

VERIZON

By: 

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cc: Jim Ball, Policy Division, International Bureau

⁵ *Verizon-MCI Order* n.492.

⁶ See *AT&T et al., Joint Application for a License to Land and Operate a Submarine Cable Network Between the United States and Japan*, 14 FCC Rcd 13066 (1999) (granting a cable landing license to several entities, including GTE Hawaiian Tel International Incorporated, the predecessor company of VHI).